

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

KATHLEEN DROBA,

Plaintiff,

Case No. 1:24-cv-1277

Hon.

-VS-

NOTICE OF REMOVAL

SYDNEY CRAWFORD,

Defendant.

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NOTICE OF REMOVAL

Defendant, SYDNEY CRAWFORD, by counsel, R. Michael John of Garan Lucow Miller, P.C., respectfully notifies this Court of the Removal of the above-captioned cause from the Ingham County Circuit Court, State of Michigan, pursuant to 28 U.S.C. § 1332(a), 28 U.S.C. § 1441 and 28 U.S.C. § 1446 and in support thereof, states as follows:

1. This action is being removed to the United States District Court for the Western District Court of Michigan, Southern Division, on the basis of diversity of citizenship.

2. On September 5, 2024, the Plaintiff filed in Ingham County Circuit Court, State of Michigan, a Summons and Complaint in the above-titled civil action under Case Number 2024-725-NI (Hon. Wanda M. Stokes)

3. A copy of the Summons and Complaint was served upon the Defendant, Sydney Crawford by first class mail on November 7, 2024, pursuant to an Order for Alternate Service dated October 29, 2024. **(Ex. A: Order Regarding Alternate Service)**

4. This action is a civil action for which this Honorable Court has jurisdiction pursuant to 28 U.S.C. 1332 (a)(1) and 1332(b), and is one that may be removed pursuant to U.S.C. § 1441, as Plaintiff's claimed damages arguably exceed \$75,000.00. In that regard, the Plaintiff's Complaint alleges that Plaintiff Kathleen Droba was injured in a hockey game when the Defendant Sydney Crawford illegally checked her causing her to fall to the ice. Plaintiff's alleged injuries include loss of consciousness, compression spinal fractures in T10 and T11, persistent headaches, nausea, vertigo, lightheadedness, loss of balance, memory loss, bowel/bladder control issues, impaired cognitive ability, mood swings, decreased quality of life, increased difficulty with activities of daily living, mental pain and anxiety, psychological harm and injury, past, present and future pain and suffering as a direct and proximate result of the injuries sustained, and past and present and future medical treatment. In addition, Plaintiff alleged wage loss and impairment to her earning capacity caused by these injuries. **(Ex B: Plaintiff's Complaint, ¶12, 21)**

5. This Petition for Removal is being filed with the Court within thirty (30) days after Plaintiff's Complaint was first served on Defendant Sydney Crawford on November 7, 2024.

6. The Plaintiff is a resident of Franklin County, State of Pennsylvania and, therefore, is a citizen of the State of Pennsylvania. **(Ex B, ¶1)**

7. The Defendant Sydney Crawford is an individual who resides in Bloomfield Hills, Oakland County, State of Michigan and, therefore, is a citizen of the State of Michigan.

8. Ingham County Circuit Court is within the venue of the United States District Court, Western District, Southern Division, of Michigan.

9. Contemporaneously herewith, written notice is being provided to all adverse parties and to the Clerk of the Ingham County Circuit Court, that this Notice of Removal is being filed in this Court.

WHEREFORE, Defendant, SYDNEY CRAWFORD, by counsel, hereby notifies this Honorable Court of the removal of this action from the Ingham County Circuit Court, State of Michigan, to the United States District Court, Western District of Michigan, Southern Division.

Respectfully submitted,

Dated: December 3, 2024

/s/ R. Michael John _____
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Attorney for and on behalf of Sydney Crawford

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CERTIFICATE OF SERVICE

I hereby certify that on the 3rd day of December, 2024, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which sent notification of such filing on all counsel listed below, who may access this filing through the Court's Electronic Filing System or I achieved service of the above and foregoing by way of electronic mail to the following:

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